



The Fertilizer Institute

Nourish, Replenish, Grow

Testimony of
Allen Summers
of
ASMARK, Inc.,
on behalf of **The Fertilizer Institute**

Before the
**House Homeland Security Subcommittee on Economic
Security, Infrastructure Protection and Cybersecurity**

Regarding
Chemical Facility Security

DESCRIPTION OF TESTIMONY

A description of the many homeland security efforts American fertilizer and agricultural producers have recently undertaken and steps Congress could take to assist the agricultural community.

June 15, 2005

Introduction

Mr. Chairman and members of the subcommittee, I am Allen Summers. I'm a farmer, retail fertilizer dealer and compliance consultant specializing in safety and security at agricultural retail locations and I am here today to testify on behalf of The Fertilizer Institute (TFI). TFI is the leading voice of the nation's fertilizer industry, representing the public policy, communication and statistical needs of manufacturers, producers, retailers and transporters of fertilizer. On behalf of TFI, I very much appreciate the opportunity to testify today on the tremendous security efforts the American agricultural community has already undertaken and the steps Congress could take to bolster those efforts.

Currently, I reside in Owensboro, Ky., where I pursue my life-long commitment to agriculture, a commitment that began on my family's farm in 1974. We currently farm over 800 acres of corn, soybean, wheat and tobacco and raise beef cattle and hogs. I am also a partner in Cecilia Farm Service, a retail farm supply business located in Cecilia, Ky., which provides custom fertilizer and crop protection product application to over 1,000 customers, representing 30,000 acres with a dollar volume last year of \$5.7 million. Cecilia has eight full time employees and hires four seasonal workers during the busy spring planting and fall harvest season.

Fifteen years ago I recognized a need in the agribusiness retail dealer community for assistance in bringing businesses into compliance with a wide range of federal regulations. Subsequently, together with my wife Susan and business partner Randy Lawrence, I established ASMARK, Inc., which offers security and compliance assistance services regarding numerous regulatory regimes including: Department of Transportation (DOT) driver qualification requirements; the Environmental Protection Agency's Risk Management Program; and Occupational Safety and Health Administration hazard communication regulations.

Today, ASMARK, and its 14 full-time employees, is helping over 985 clients comply with federal regulations and meet industry security standards. Our clients include large, multi-outlet agribusiness retail dealers as well as smaller independent agribusinesses.

Fertilizer and Security

In response to the tragic events in Oklahoma City and the September 11 terrorist attacks, agribusiness retail dealers undertook tremendous efforts to ensure that criminals intent on harming our country could not purchase and misuse fertilizer and crop protection products that are vital in helping feed and nurture America and the world.

For example, in 2002 the fertilizer industry adopted a management practices security code designed to help the industry achieve continuous security performance using a risk-based approach. The code calls on fertilizer makers to use methodologies developed by the Center for Chemical Process Safety (CCPS) or the Synthetic Organic Chemical Manufacturers Association when making security-related improvements (**Exhibit A**).

Also in 2002, I began working with several of my clients and the Agribusiness Security Working Group, comprised of members of TFI, the Agricultural Retailers Association and CropLife America, to develop a program to aid agribusiness retail dealers improve facility security to

protect their fertilizer and crop protection products. As a result, a Web-based security vulnerability assessment (SVA) tool was developed and is now available to agribusiness retailers. The SVA tool is an invaluable security program that assists retailers in fully meeting the criteria the CCPS has created for conducting security vulnerability assessments (**Exhibit B**). To date, the tool has proven to be a remarkable success, and is used by over 2,500 agribusiness retailers to develop security plans, based on SVA assessments, to address threats, risks and vulnerabilities.

The SVA tool also has a transportation component aimed at helping facilities comply with DOT security regulations. Most recently, Clemson University purchased the tool, making it available to all agribusiness retailers in South Carolina and just last week, I was contacted by the Alabama Department of Homeland Security regarding its potential interest in an arrangement to make the SVA available to all agribusinesses in Alabama. Naturally, we look forward to working with other states that might be interested in using the SVA to improve agribusiness facility security.

In addition to the Web-based SVA tool, the Agribusiness Security Working Group has also developed and widely distributed “Guidelines to Help Ensure a Secure Agribusiness.” This six page document highlights three key security principles – identification of critical assets; establishment of layers of protection, and practice deter, detect and delay. The guidelines outline suggested practices covering facility security, customer transactions, special security measures and suggestions for partnering with customers on security and safety.

As an owner of a farm supply center and a farmer, I firmly believe I have an obligation to ensure the security of the chemicals I store and apply. For example, at my farm center local fire and law enforcement officials are frequently invited to walk through the facility to recommend what additional security measures might be needed and to be provided with updates on the types of products we have on hand. I cannot of course speak for everyone in the agricultural community, but I do know that many of us have, on a voluntary basis, installed expensive security upgrades, conducted background checks on our employees and complied with DOT security regulations for transportation. Without question, a great many members of the agricultural community have undertaken tremendous efforts to guarantee the security of our nation.

Across the country farmers and retailers are engaged in security efforts virtually unknown to the vast majority of the public. To illustrate, few members of the public may know that agricultural retailers and the Coast Guard work together to improve facility security. Yet from coast-to-coast, many agribusinesses have filed extensive security vulnerability assessments and plans with the Coast Guard in order to comply with the Maritime Transportation Security Act.

In addition, commodity and production agriculture groups are actively working with the U.S. Department of Agriculture to develop practices to better secure inputs and design bio-safety protocols to address farm and ranch security issues. These on-going efforts are intended to increase producer-level awareness of steps that can be taken to safeguard America from acts of terrorism.

What More Needs to Be Done?

During this hearing there has been considerable debate on whether Congress should approve

chemical facility security regulations. There are those who charge that the chemical industry is not doing enough to secure products that wind up the hands of terrorists. In addition, there has been considerable debate over whether to mandate the use of inherently safer technologies (IST).

Mr. Chairman, at this time I would like to briefly comment on these issues. The agricultural community, which bears the great burden of producing the food that feeds the world, is totally committed to the security of our homeland. Our strong commitment to security can be seen in the many steps already taken to secure our facilities, our farms and our food supply. Animal and crop producers, and retailers across the country have voluntarily conducted security assessments and developed security plans in response. Through our national and affiliated state associations we continuously remind the agribusiness community of their obligations to secure their facilities and the products they handle. In short, the agricultural community has done so much to improve security and must receive credit for the voluntary actions we have already taken.

Mr. Chairman, it must be said that agribusinesses are generally located in rural, sparsely populated areas that are unlikely to be attacked by terrorists. The agriculture community has shown it is willing to do all that it can to help secure our country, but remember that each year millions of acres must be planted in a few short weeks and security measures that may work well for urban manufacturing centers will not work for agriculture. Therefore, it is essential that future security requirements are proportional to the risks found in rural communities.

Finally, IST is not a security issue – it is a safety issue. If there is a safer, more economical way of doing something, we do it. IST is a decades-old, antiquated concept that can only work when applied by a site owner's engineers who truly understand the operation of the facility. Any attempt to require IST by government edict jeopardizes worker and community safety. Mr. Chairman, the agriculture community would strenuously oppose any proposal that would mandate the use of IST.

Conclusion

Mr. Chairman and members of the committee, American farmers and retailers are committed to security, of that there can be no doubt. That commitment is readily demonstrated through the significant number of voluntary security steps our community has taken and will continue to take. Without question, we very much want to help Congress in its endeavors to shield this country from acts of terrorism. We support Department of Homeland Security (DHS) Secretary Chertoff's efforts to evaluate all of the nation's vulnerabilities and then prioritize the Federal government's response based on sound risk assessments.

All we ask is that members of Congress recognize the tremendous actions already taken by our community, provide fair treatment for small, low-risk facilities, and reject any and all attempts to revive obsolete concepts like IST. In taking on 21st Century terrorists, Congress must first recognize the progress that has been made to date and take account of on-going DHS efforts to develop a framework that recognizes the special needs of agriculture.

I thank you for the opportunity to testify today and look forward to answering any questions you might have.



The Fertilizer Institute

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EXHIBITS



The Fertilizer Institute

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EXHIBIT A

The Fertilizer Institute's Security Code of Management Practices For the Fertilizer Industry

September 23, 2002

Purpose and Scope

The purpose of The Fertilizer Institute's (TFI's) **"Security Code of Management Practices for the Fertilizer Industry"** is to help the fertilizer industry protect people, property, products, processes, information and information systems by enhancing security, including security against a potential terrorist attack. The fertilizer industry encompasses manufacturers, retailers and distributors.

This code is designed to help the fertilizer industry achieve continuous security performance using a risk-based approach to identify, assess and address vulnerabilities, prevent or mitigate incidents, enhance training and response capabilities, and maintain and improve relationships with key state, local and federal government partners. The code is implemented with the understanding that security is a shared responsibility requiring actions by all stakeholders including carriers, customers, suppliers, service providers, government officials and agencies.

Relationship to Other Industry Commitments

The fertilizer industry's commitment to protecting its employees and the public is demonstrated by the implementation of this security code and other good management practices. The fertilizer industry should regularly reassess these security-related practices in an effort to continually improve performance and identify potential vulnerabilities.

Management Practices

A risk-based security management system for people, property, products, processes, information and information systems throughout the fertilizer industry should be implemented. The fertilizer industry encompasses manufacturers, retailers and distributors.

The security management system must include the following management practices:

1. Leadership Commitment

Senior management commits to continuous improvement through accountability, published

policies, and provision of sufficient and qualified resources.

2. Analysis of Threats, Vulnerabilities and Consequences

Use available security vulnerability assessment (SVA) methodologies, prioritize and periodically analyze potential security threats, vulnerabilities and consequences. The writers of this code encourage manufacturing facilities to conduct vulnerability assessments using methods developed by the Center for Chemical Process Safety (CCPS), Synthetic Organic Chemical Manufacturers Association (SOCMA), or other equivalent methods.

Writers of this code encourage retailers and distributors to conduct vulnerability assessments using methods developed by the Agribusiness Security Working Group (whose members include the Agricultural Retailers Association (ARA), CropLife America and The Fertilizer Institute (TFI)), or methods developed by CCPS, SOCMA, or other equivalent methods.

3. Implementation of Security Measures

Develop and implement security measures commensurate with identified risks.

4. Information and Cyber-Security

Protect information and information systems as a critical component of a sound security management system.

5. Documentation

Document key elements in security management programs, processes and procedures.

6. Training, Drills and Guidance

Train, drill, and provide guidance for employees, contractors, service providers, and others, as appropriate, to enhance awareness and capability.

7. Communications, Dialogue and Information Exchange

Communicate, foster dialogue and exchange information on appropriate security issues with

employees, contractors, communities, customers, suppliers, service providers and government officials, agencies and law enforcement officials. This dialogue and information exchange should be balanced with safeguards for sensitive information.

8. Response to Security Threats

Evaluate, respond, report and communicate security threats as appropriate. Fertilizer facilities will promptly evaluate the real and credible threats and will report and communicate to the fertilizer industry and law enforcement personnel as appropriate.

9. Response to Security Incidents

Evaluate, respond, investigate, report, communicate and take corrective action for security incidents. If an incident should occur, the fertilizer facility will promptly respond and involve government agencies as appropriate. After investigating the incident, the fertilizer facility will incorporate lessons learned and will, as appropriate, share those lessons with others in the fertilizer industry and government agencies and implement corrective actions.

10. Audits

Conduct periodic audits of fertilizer facilities to assess security programs and processes, and implementation of corrective actions.

11. Third-Party Verification

Verification by a third-party, that facilities with potential off-site impacts have implemented the physical site security measures to which they have committed.

12. Management of Change

Evaluate and manage security issues associated with changes involving people, property, products, processes and information or information systems.

13. Continuous Improvement

Utilize continuous performance improvement processes entailing planning, establishment of goals and objectives, monitoring of progress and performance, analysis of trends and

development and implementation of corrective actions.

The fertilizer industry will share information on effective security practices within the fertilizer industry and with external, qualified security professionals. The fertilizer industry will continue to expand the awareness of and commitment to enhanced security practices throughout the fertilizer industry. TFI will continue to provide guidance, including sharing examples of effective member security practices, to assist the fertilizer industry in implementation of this code. It will periodically review and, as appropriate, revise the guidance, and will continue to serve as the industry clearinghouse for the exchange of information on security through the secure members only Web site: <http://www.npknet.org>.

Due to the rapidly evolving nature of security issues and related expertise, TFI will reassess this security code, its management practices and implementation timetable two years after code adoption or earlier as appropriate. Security code implementation guidance will be updated as necessary in the interim.

Time Schedule:

One of the first SVA activities is to perform an initial prioritization of potential security hazards at all facilities operated by the enterprise. This initial prioritization assessment, or enterprise level screening process, will establish the “timeframe tier” for the facility. The enterprise level screening process separates facilities into different tiers based on potential severity of attack, difficulty of attack and attractiveness of the target(s). Based on this screening, the company can then focus energies to complete site security vulnerability assessments and implement specific steps to improve security where it is most needed.

The fertilizer industry should implement all security code practices using the initial prioritization timetable below commencing on the date this code is approved. Timelines for completion of site security vulnerability assessments, implementation of site security measures and verification are found below in Table 1.

For example, a Tier I facility would fall into the highest risk level, Tier II medium risk level, and Tier III low risk level.

Table 1: Schedule for Implementation of Security Assessment

Security Process	Timeframe Tier I	Timeframe Tier II	Timeframe Tier III
Complete Site Security Vulnerability Assessment	6 months	12 months	18 months
Complete Implementation of Site Security Measures	18 months	24 months	30 months
Verification of Physical Site Security	21 months	27 months	33 months

The Fertilizer Institute (TFI) represents by voluntary membership the nation's fertilizer producers, manufacturers, retailers, trading firms and equipment manufacturers. This security code of manufacturing practices was developed in keeping with TFI's efforts to protect and promote the nation's fertilizer industry. For more information, please contact TFI at (202) 962-0490 or visit TFI's Web site at <http://www.tfi.org>.



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EXHIBIT B

Sample Security Vulnerability Assessment Questionnaire



eVA



Asmark Vulnerability Assessment Model (eVA)

eVulnerability Assessment is a tool for retail facilities and terminals to use to identify and assess potential security threats, risks and vulnerabilities. Each company must implement a risk-based security management system for people, property, products, processes, information and information systems throughout the agricultural industry.

The methodology developed for this module is a systematic, risk-based approach where risk is a function of:

- the severity of consequences of an undesired event; and,
- the likelihood of adversary attack; and,
- the likelihood of adversary success in causing the undesired event.

eVA has been designed especially for the agricultural industry. Relative security risks have received a weighted factor and are tabulated to provide initial risk status prioritization of the facility and a written vulnerability assessment document. Recommended actions to reduce or eliminate security risks are provided with the eVA certification document.



The Asmark Security Vulnerability Assessment model has been determined to meet the CCPS® security vulnerability assessment design criteria for conducting security assessments.

Please follow these steps to complete and produce your vulnerability assessment:

Step 1.

Verify your facility information.

Step 2.

Answer the questions in this section to prioritize the risk status of the facility.

Step 3.

Answer the questions in this section to complete the vulnerability assessment.

Step 4.

Review your answers for accuracy and print a copy of the form with answers.

Step 5.

Print the Vulnerability Assessment Report.



ADVISORY
Homeland Security

Current Threat Level :



Step 1. Verify Your Facility Information

Business Name Sample Farm Service,
Unit Number
Physical Address 4940 Rutabaga Road (ex. 123 Main Street)
Mailing Address PO Box 99 (ex. PO Box 99)
City Burling
State Illinois
Zip Code 65892

Facility Coordinator Milton Samples
Office Phone Number 618-254-9899
Home Phone Number 618-254-1426

Preparer's Name Ed Samples (Representative of the business)
Email Address ed@samples.com (Required for Confirmation)

Name of Owner Sample Farm Service,
Mailing Address of Owner PO Box 99
City Burling
State Illinois
Zip Code 65892
Office Phone Number 618-254-9899

Todays Date 5/22/2003

Scope of Operations

Retail Operation ☒
Wholesale Operation ☐

Agricultural Chemicals ☒
Dry Fertilizers ☒
Liquid Fertilizers ☒
Anhydrous Ammonia ☒

- Liquefied Petroleum Gas ☐
- Petroleum Products ☐
- Grain Elevator ☐
- Consumer Center ☐

Step 2. Prioritize the Risk Status of the Facility

Please review each of the following questions carefully and provide an answer. Please answer all questions that best describes this facility today.

1. For each of the following security-sensitive materials please enter the largest quantity stored on-site at this facility at any one time during the past year. (If none, enter 0.)

Ammonium nitrate	0	pounds
Anhydrous ammonia	320000	pounds
Aqua ammonia	0	gallons
Diesel fuel	2000	gallons
Gasoline	1000	gallons
Nitric Acid	0	gallons
Propane (LP Gas)	0	gallons
Urea	100000	pounds
Inhalation hazard pesticide(s)	20000	pounds
Class 1 Poison(s) (Pesticide with "Danger-Poison" signal word on label.)	<input checked="" type="radio"/> Yes <input type="radio"/> No	
Class 1-9 Hazardous Material(s) (As defined by DOT, also appears on the shipping unit.)	<input checked="" type="radio"/> Yes <input type="radio"/> No	

2. Does this facility have a Risk Management Plan (RMP) on file?
(If NO, proceed to question number 5.) ☒ Yes ☐ No

3. Are the RMP processes for this facility classified as either Program 2 or Program 3? (Refer to page 3 of the RMP.) ☒ Yes ☐ No

4. Please select the statement that best describes the relative difficulty a terrorist or criminal would encounter in causing the "worst case" scenario documented in the RMP for this facility.

Typically the "worst case" scenario is the complete loss of the contents of the largest storage tank.
(Refer to page 3 of the RMP for this facility for the worst case scenario.)

The "worst case" scenario for this facility could be caused by a successful attack which would require:
(Please choose only one.)

- a. A well-planned and coordinated series of events involving several individuals with special knowledge and/or training, and breaching several levels of protection. ☐
- b. A small group of individuals (or an insider with special knowledge) with equipment or materials available to organized groups of terrorists and **does** require access to restricted-access areas. ☐
- c. A small group of individuals with equipment or materials available to organized groups of terrorists and **does not** require access to restricted-access areas. ☐

d. A single individual with readily available equipment or materials.

5. What is the estimated number of people affected by the potential "worst case" scenario documented in the RMP for this facility. (Refer to page 3 of the RMP for this facility for this information or if no RMP is available, refer to the estimated number in the county emergency plan.)

(Please choose only one.)

- a. 0 to 999 people ☒
- b. 1,000 to 9,999 people ☐
- c. 10,000 to 99,999 people ☐
- d. 100,000 or more ☐

6. Please select the statement that best describes the relative attractiveness this facility would have as a target to a terrorist or criminal.

A successful attack: (Please choose only one.)

- a. Is unlikely to affect the local economy or infrastructure. ☒
- b. Is unlikely to disrupt the local economy or infrastructure but could create primarily local concern and attention. ☐
- c. Is likely to impact the regional economy, disrupt the regional infrastructure, or cause extensive property damage and would likely generate some national concern or attention. ☐
- d. Is likely to impact the national economy, disrupt national infrastructure and create significant national attention. ☐

Step 3. Perform the Vulnerability Assessment

Please review each of the following questions carefully and provide an answer.

7. Has a written vulnerability assessment been prepared for this facility in the past three years? ☐ Yes ☒ No

8. What is the total estimated quantity of all pesticides (liquid and dry) stored at this facility at any one time during the past year? (Please choose only one.)

- a. 0 to 9,999 pounds ☐
- b. 10,000 to 249,999 pounds ☒
- c. 250,000 to 499,999 pounds ☐
- d. 500,000 or more ☐

9. Please provide answers to best describe the location where package pesticides are stored at this facility. (Please answer each question.)

Are package pesticides stored on-site?
(If No, proceed to question 10)

☒ Yes ☐ No

Are all package pesticides located: (Please answer each question.)

- a. Within secondary containment?
- b. Within a fenced area?

☐ Yes ☒ No

☐ Yes ☒ No

c. Within a secured building?

☒ Yes ☐ No

1. If Yes, is an alarm system utilized?

☐ Yes ☒ No

10. Please provide answers to best describe the location where minibulk pesticides are stored at this facility.
(Please choose only one.)

Are minibulk pesticides stored on-site?

(If No, proceed to question 11)

☒ Yes ☐ No

a. Are all tanks located within secondary containment?

☒ Yes ☐ No

b. Are all tanks located within a fenced area?

☒ Yes ☐ No

c. Are all tanks located within a secured building?

☐ Yes ☒ No

1. If Yes, is an alarm system utilized?

☐ Yes ☒ No

11. Please provide answers to best describe the storage and handling of bulk liquid pesticides at this facility.
(Please answer each question.)

Are bulk liquid pesticide tanks located on-site?

(If No, proceed to question 12)

☒ Yes ☐ No

a. Are all tanks located within secondary containment?

☒ Yes ☐ No

b. Are all tanks located within a fenced area?

☒ Yes ☐ No

c. Are all tanks located within a secured building?

☒ Yes ☐ No

1. If Yes, is an alarm system utilized?

☐ Yes ☒ No

d. Are all tanks equipped with valve locks?

☒ Yes ☐ No

e. Are all tanks made of stainless steel or metal?

☐ Yes ☒ No

12. What is the total estimated quantity of all liquid fertilizer stored at this facility at any one time during the past year? (Please choose only one.)

a. 0 to 249,999 gallons

☐

b. 250,000 to 999,999 gallons

☒

c. 1,000,000 to 1,999,999 gallons

☐

d. 2,000,000 or more

☐

13. What is the volume of the largest bulk liquid storage tank at this facility?
(Please choose only one.)

a. 0 to 30,000 gallons

☒

b. 30,001 to 500,000 gallons

☐

c. 500,001 to 1,000,000 gallons

☐

d. 1,000,001 or more

☐

14. Please provide answers to best describe the storage and handling of bulk liquid fertilizers at this facility.
(Please answer each question.)

Are bulk liquid fertilizer tanks located on-site?

(If No, proceed to question 15)

☒ Yes ☐ No

a. Are all tanks located within secondary containment?

☒ Yes ☐ No

b. Are all tanks located within a fenced area?

☐ Yes ☒ No

c. Are all tanks located within a secured building?

☐ Yes ☒ No

1. If Yes, is an alarm system utilized?

☐ Yes ☒ No

- d. Are all tanks equipped with valve locks? ☒ Yes ☐ No
- e. Are all tanks made of stainless steel or metal? ☒ Yes ☐ No

15. What is the total estimated quantity of all dry fertilizer stored at this facility at any one time during the past year? (Please choose only one.)

- a. 0 to 4,999 tons ☐
- b. 5,000 to 9,999 tons ☒
- c. 10,000 to 99,999 tons ☐
- d. 100,000 or more ☐

16. Please provide answers to best describe the location where bulk dry fertilizers are stored at this facility. (Please answer each question.)

Is bulk dry fertilizer stored on-site?
(If No, proceed to question 17) ☒ Yes ☐ No

Are all dry bulk fertilizers located: (Please answer each question.)

- a. Within a fenced area? ☒ Yes ☐ No
- b. Within an enclosed and secured building? ☐ Yes ☒ No
1. If Yes, is an alarm system utilized? ☐ Yes ☒ No

17. Please provide answers to best describe the location where anhydrous ammonia is stored in stationary storage tanks at this facility. (Please answer each question.)

Are anhydrous ammonia stationary tanks located on-site?
(If No, proceed to question 18) ☒ Yes ☐ No

- a. Are all tanks located within a fenced area? ☒ Yes ☐ No
- b. Are all tanks equipped with valve locks? ☒ Yes ☐ No
- c. Is an alarm system utilized? ☐ Yes ☒ No
- d. Are security-related additives utilized? ☐ Yes ☒ No

18. Please provide answers to best describe the location where nurse wagons filled with anhydrous ammonia are stored at this facility. (Please answer each question.)

Are filled nurse wagons of ammonia stored on-site?
(If No, proceed to question 19) ☒ Yes ☐ No

- a. Are all nurse wagons located within a fenced area? ☐ Yes ☒ No
- b. Are all nurse wagons equipped with valve locks? ☐ Yes ☒ No
- c. Are all nurse wagons equipped with tire locks? ☐ Yes ☒ No
- d. Are all transfer hoses removed from tanks as an additional security measure? ☒ Yes ☐ No
- e. Are security-related additives utilized? ☐ Yes ☒ No

19. Please provide answers to best describe the location where propane is stored at this facility. (Please answer each question.)

Are propane tanks (for retail distribution) located on-site?
(If No, proceed to question 20) ☐ Yes ☒ No

- a. Are all tanks located within a fenced area? ☐ Yes ☐ No
- b. Are all tanks equipped with valve locks? ☐ Yes ☐ No

c. Is an alarm system utilized?

☐ Yes ☐ No

20. Please provide answers to best describe the storage and handling of bulk petroleum products at this facility. (Please answer each question.)

Are bulk petroleum storage tanks located on-site?
(If No, proceed to question 21)

☒ Yes ☐ No

a. Are all tanks located within secondary containment?

☒ Yes ☐ No

b. Are all tanks located within a fenced area?

☐ Yes ☒ No

c. Are all tanks equipped with valve locks?

☒ Yes ☐ No

d. Is electrical power shut off when unattended?

☒ Yes ☐ No

21. Does this facility monitor inventory levels at the beginning of each shift?

☐ Yes ☒ No

22. Does this facility store any products that requires special storage conditions such as refrigeration?

☐ Yes ☒ No

23. Does this facility have a process using equipment controlled or accessible by offsite computers?

☐ Yes ☒ No

24. Please select the statement that best describes the location of processes such as the production of reacted fertilizer. (Please choose only one.)

No such processes located on-site.

☒

a. Indoors and secured or monitored.

☐

b. Indoors, unsecured.

☐

c. Outdoors and secured or monitored.

☐

d. Outdoors, unsecured.

☐

25. Please select the statement that best describes the duration of rail storage.

Rail cars are: (Please choose only one.)

Not received at this location.

☐

a. Not on-site for more than 24 hours.

☐

b. Not on-site for more than 48 hours.

☐

c. Not on-site for more than 72 hours.

☐

d. On-site for more than 3 days.

☒

26. Please select the statement that best describes the duration of truck transport storage.

Transport trucks are: (Please choose only one.)

Not received at this location.

☐

a. Not on-site for more than 4 hours.

☒

b. Not on-site for more than 8 hours.

☐

c. Not on-site for more than 24 hours.

☐

d. On-site for more than 24 hours.

27. Please select the statement that best describes the duration of barge storage.

Barges are: *(Please choose only one.)*

Not received at this location. ☒

- a. Not on-site for more than 2 days. ☐
- b. Not on-site for more than 3 days. ☐
- c. Not on-site for more than 7 days. ☐
- d. On-site for more than 7 days. ☐

28. Please select the statement that best describes how easily the public can identify with the brand name of this facility. *(Please choose only one.)*

- a. Not recognizable - locally owned. ☒
- b. Recognizable - regionally recognized brand name. ☐
- c. Recognizable - nationally recognized brand name. ☐
- d. Recognizable - globally recognized brand name. ☐

29. Please select the statement that best describes how easily this facility is recognized as having security-sensitive chemicals on-site. *(Please choose only one.)*

- a. Not recognizable - storage indoors, no signs, no tanks. ☐
- b. Recognizable to industry-related people only. ☒
- c. Recognizable to technical people regardless of industry. ☐
- d. Easily recognized by most people. ☐

30. Please select the statement that best describes the visibility of this facility. *(Please choose only one.)*

- a. No chemical, product or process descriptions appear on an outdoor visible sign or marking. ☒
- b. Only process descriptions appear on an outdoor visible sign or marking. ☐
- c. Chemical or product descriptions appear on an outdoor visible sign or marking. ☐
- d. The word chemical appears on an outdoor visible sign or marking. ☐

31. Does this facility advertise (ex. radio, newspaper, trucks) it's services, products or includes the word "chemical" in advertising?

☒ Yes ☐ No

32. Does this facility have a website that lists sensitive information such as services, products or includes the word "chemical"?

☒ Yes ☐ No

33. Does this facility have a fence or other physical barrier installed around the entire property or sensitive areas that prevents the entry of unauthorized individuals?

☐ Yes ☒ No

(ex. Could a person enter this facility on foot or a four-wheeler?)

34. Please select the statement that best describes the physical barrier(s) installed by this facility to prevent unauthorized entry. *(Please choose only one.)*

Physical barriers such as ditches, berms, buildings, fenced sections or natural barriers:

- a. Are present for the entire perimeter. ☐

- b. Are not present for the entire perimeter. ☒
35. Please select the statement that best describes this facility's entrances. *(Please choose only one.)*
- a. All gates are locked and monitored when not in use. ☐
 - b. All gates are locked when not in use. ☒
 - c. Gates unlocked. ☐
 - d. No gates present. ☐
36. Does this facility utilize intrusion detection devices that are "live-time" or connected directly to local law enforcement? ☐ Yes ☒ No
37. Does this facility utilize private security guards to monitor sensitive areas, control access and perform patrols? ☐ Yes ☒ No
38. Has this facility arranged for local law enforcement to routinely check on (drive around or drive through) this facility after hours, on weekends and holidays? ☒ Yes ☐ No
39. Please select the statement that best describes this facility's rail or barge siding security. *(Please choose only one.)*
- a. No rail or barge siding on-site. ☒
 - b. Siding fenced with all gates locked and monitored when not in use. ☐
 - c. Siding fenced with all gates locked when not in use. ☐
 - d. Sidings are unsecured. ☐
40. Please select the statement that best describes this facility's utilization of locks. *(Please choose only one.)*
- a. All sensitive areas are kept locked if a person is not present. ☐
 - b. Most sensitive areas are kept locked if a person is not present. ☐
 - c. Some areas are allowed to stay unlocked during operating hours. ☒
 - d. All sensitive areas are unlocked during operating hours. ☐
41. Please select the statement that best describes the lighting at this facility. *(Please choose only one.)*
- a. All exterior areas are bright and well-lit. ☐
 - b. Perimeter and sensitive outdoor areas are bright and well-lit. ☐
 - c. Only critical areas are well-lit. ☒
 - d. No (or poor) exterior lighting. ☐
42. Does this facility have security policies and practices in-place that help reduce potential vulnerability? ☐ Yes ☒ No
43. Does this facility have a current Emergency Plan? ☒ Yes ☐ No
44. Does this facility have one or more employees trained and certified to the requirements of OSHA 1910.120(q) HazWoper? ☒ Yes ☐ No
45. Have employees at this facility participated in a security awareness training program? ☐ Yes ☒ No
46. Does this facility verify the identity of all inspectors, auditors or other unknown visitors that are not customers? ☐ Yes ☒ No

47. Does this facility provide escorts for all visitors? ☒ Yes ☐ No
48. Does this facility provide escorts for all contractors? ☒ Yes ☐ No
49. Does this facility perform criminal background checks for all employees and contractors? ☐ Yes ☒ No
50. Is the main breaker for electric power for this facility located in a secure area? ☒ Yes ☐ No
51. Does this facility have a well-defined list of customers and actively tracks current customer information by obtaining credit references, pesticide certifications and licenses? ☒ Yes ☐ No
52. Does this facility have written procedures for screening, reviewing or otherwise limiting sales of sensitive products? ☒ Yes ☐ No
53. Does this facility prohibit cash sales of sensitive products? ☒ Yes ☐ No
54. Does this facility require the appropriate paperwork (hand ticket, invoice or shipping document) before loading package pesticides or fertilizers onto a customer's vehicle? ☒ Yes ☐ No
55. Does this facility distribute (or allow access to) keys to anyone other than employees? ☒ Yes ☐ No
56. Are all self-propelled vehicles locked and keys removed when not in use or at the end of each workday? ☒ Yes ☐ No
57. Does this facility account for all pull-type equipment such as nurse wagons, applicators and spreaders on a daily basis? ☐ Yes ☒ No
58. Are customers allowed to return equipment to facility property after business hours? ☒ Yes ☐ No
59. Has this facility, or the area immediately surrounding the facility experienced any of the following criminal or terrorist acts during the past year? *(Please select all that apply.)*
- a. None ☐
 - b. Theft of ammonium nitrate or urea. ☐
 - c. Theft of anhydrous ammonia. ☒
 - d. Act of terrorism. ☐
60. Has this facility experienced a shortage of inventory due to internal pilfering or embezzlement during the past year? ☐ Yes ☒ No
61. Please select the statement that best describes the hours of operation for this facility. *(Please choose only one.)*
- a. Totally variable - no schedule set in advance. ☐

- b. Somewhat variable - schedule changes with season. ☒
- c. Fixed schedule - one shift per day. ☐
- d. Fixed schedule - more than one shift per day. ☐

62. Does this facility have current emergency notification numbers posted prominently for contacting facility personnel?

☒ Yes ☐ No

63. Please select the statement that best describes this facility's pre-planning and coordination with local emergency response organizations. *(Please choose only one.)*

This facility's emergency response capabilities, emergency plan and a tour of the facility have been provided to: (documentation should be maintained on-file)

- a. The LEPC, Fire Department and Law Enforcement. ☐
- b. The LEPC and Fire Department. ☒
- c. The LEPC. ☐
- d. None of the above. ☐

64. Please select the statement that best describes this facility's relationship with local Law Enforcement. *(Please choose only one.)*

- a. Regular contact with law enforcement officials. ☐
- b. Frequent contact with law enforcement officials. ☐
- c. Contact with law enforcement officials on an as-needed basis only. ☒
- d. No contact. ☐

65. What is the response time of the local Law Enforcement to this facility? *(Please contact local Law Enforcement to verify the response time. Please choose only one.)*

- a. Less than 5 minutes. ☐
- b. 5-10 minutes. ☐
- c. 10-20 minutes. ☐
- d. More than 20 minutes. ☒

66. What is the response time of the local Fire Department to this facility? *(Please choose only one.)*

- a. Less than 5 minutes. ☐
- b. 5-10 minutes. ☐
- c. 10-20 minutes. ☐
- d. More than 20 minutes. ☒

67. What is the response time of the nearest off-site Hazardous Materials Team to this facility? *(Please choose only one.)*

- a. Less than 15 minutes. ☐
- b. 15-30 minutes. ☐
- c. 30-60 minutes. ☐
- d. More than 60 minutes. ☒

68. What is the response time of the local Ambulance to this facility? *(Please choose only one.)*

- a. Less than 5 minutes.
- b. 5-10 minutes.
- c. 10-20 minutes.
- d. More than 20 minutes.

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69. How many hospitals, nursing homes, child-care centers, schools or homes for physically or mentally challenged people are located within 2,000 feet of this facility? *(Please choose only one.)*

- a. None
- b. 1-4
- c. 5-10
- d. 11 or more.

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70. What is the distance to the nearest critical infrastructure such as a tunnel, bridge, municipal treatment facility, power plant or major highway? *(Please choose only one.)*

- a. More than 1 mile away.
- b. 1/2 mile to 1 mile away.
- c. 1/4 mile to 1/2 mile away.
- d. Less than 1/4 mile away.

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71. What is the distance to the nearest National or state park, monument, preserve or wildlife sanctuary? *(Please choose only one.)*

- a. More than 1 mile away.
- b. 1/2 mile to 1 mile away.
- c. 1/4 mile to 1/2 mile away.
- d. Less than 1/4 mile away.

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72. What is the distance to the nearest body of water, well or aquifer used as a municipal drinking water source? *(Please choose only one.)*

- a. More than 1 mile away.
- b. 1/2 mile to 1 mile away.
- c. 1/4 mile to 1/2 mile away.
- d. Less than 1/4 mile away.

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73. What is the distance to the nearest government building? *(Please choose only one.)*

- a. More than 1 mile away.
- b. 1/2 mile to 1 mile away.
- c. 1/4 mile to 1/2 mile away.
- d. Less than 1/4 mile away.

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74. What is the distance to the nearest major industrial park or site? *(Please choose only one.)*

- a. More than 1 mile away.
- b. 1/2 mile to 1 mile away.

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- c. 1/4 mile to 1/2 mile away.
- d. Less than 1/4 mile away.

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75. Please select the statement that best describes the potential economic impact that could result from an attack upon this facility? (Please choose only one.)

- a. Only the facility and surrounding area may be affected.
- b. The entire business or company may be affected.
- c. The regional economy may be affected.
- d. The national economy may be affected.

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76. Does this facility have a current written Security Plan which addresses the storage, handling and transport of hazardous materials, as defined by the DOT?

☐ Yes ☒ No

77. Do employees have access to the Security Plan for this facility?

☐ Yes ☒ No

78. Please enter the U.S. DOT Hazardous Materials Registration Number for your company. (Enter 13 digit number or leave blank if not registered)

123456789123K

79. Are all "HazMat" employees currently trained under HM-126f?
(A HazMat employee is anyone who affects the safe transportation of a hazardous material. HM-126f is a DOT training requirement for HazMat employees.)

☒ Yes ☐ No

80. Does the Emergency Plan for this facility include procedures for response and handling transportation-related emergencies?

☒ Yes ☐ No

81. Does this facility maintain contact (by mobile phone, two-way radio, etc.) with the driver of shipments of hazardous materials, as defined by the DOT?

☒ Yes ☐ No

82. Does this facility take measures to avoid routes of transportation with critical infrastructure and other sensitive areas such as tunnels, major bridges, water supplies, hospitals, etc.?

☐ Yes ☒ No

83. Are all shipments of hazardous materials, as defined by the DOT, secured by locks, seals or other devices, or through the use of a properly trained and qualified attendant?

☐ Yes ☒ No

84. Does this facility require the signature of a responsible person for shipments of hazardous materials, as defined by the DOT, upon all deliveries?

☐ Yes ☒ No

85. Does this facility take measures to confirm employment history, citizenship or immigration status on job applicants for positions that involve access to hazardous materials, as defined by the DOT?

☒ Yes ☐ No

Continue

Preliminary Security Vulnerability Assessment Report 5/22/2003

A. The **Risk Index** for this facility, based upon the answers provided is:

Tier 2 facility (Medium risk level for prioritizing facilities)

Requirement	Timeframe Tier 1	Timeframe Tier 2	Timeframe Tier 3	Timeframe Tier 4
Complete vulnerability assessment	12-31-02	6-30-03	12-31-03	12-31-03
Implement security enhancements	12-31-03	6-30-04	12-31-04	12-31-04
Verification by third party	3-31-04	9-30-04	3-31-05	Not Required

B. The **Vulnerability Index**, based upon the answers provided indicates this facility would be considered a:

Medium risk facility

The final Vulnerability Assessment Report for this facility will be prepared, reviewed and mailed with 10 days. The final Vulnerability Assessment Report will contain recommendations to increase security and reduce vulnerability at this site.